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October 30, 2003

The Honorable Benson E. Legg
United States District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, MD 21201

RE: Wyndholme Village, LLC, *et al.*
v. NADIF of Wyndholme, LLC, *et al.*
Civil Action No.: 01-3809

Dear Judge Legg:

Please consider this a request, for purposes of the Court's rulings on the motions for summary judgment, for an extension to file materials received from Bank of America in response to Defendants' motions for summary judgment until November 21, 2003. This is a follow-up request to the Court's Order of August 25, 2003 (Paper No. 75) in which the Court denied Defendants' motion to quash the subpoena issued to Bank of America (Paper No. 65) and granted Plaintiffs' motion to compel Bank of America to comply with the subpoena (Paper No. 67).

On October 3, 2003, we received some of the records requested from Bank of America, which consist of the monthly statements of North American Doctors Investment Fund, Inc., the entity listed on the business cards of Stuart Fisher and Defendant Zukerman distributed to relevant persons in 1999. In further compliance with the subpoena and the Court's Order, Bank of America produced to us on October 28, 2003 the individual canceled checks and deposit slips for the account of North American Doctors Investment Fund, Inc. from approximately January 1999 through approximately June 2001. The latter records consist of approximately 1,302 checks and deposit slips.

The Honorable Benson E. Legg
October 30, 2003
Page 2

my preliminary review, it appears that this account, in the name of North American Doctors Investment Fund, Inc., may have been used by Mr. Fisher as a personal account and did not contain the funds Fisher claimed North American Doctors Investment Fund, Inc. had. This is the only account that we have been able to locate in the name of North American Doctors Investment Fund, Inc.

Due to the volume of the documents, we want to analyze them and present them to the Court in an organized and condensed fashion as opposed to in raw form. We estimate that this would take approximately three weeks and would request an extension of time to file these until November 21, 2003.

Thank you.

Very truly yours,

Howard J. Schulman

HJS/hrk

cc: Mr. Stuart C. Fisher
Mr. James M. Lancelotta
Michael D. Bruckman, Esquire